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COPE FAMILY VENTURE

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:) Case No. BK-S-13-17588-LED (Lead Case)
) Chapter 11
WESTERN FUNDING INCORPORATED,) (Jointly Administered)
)
Debtor.)
)
In re:) Case No. BK-S-13-17586-LED
) Chapter 11
)
WESTERN FUNDING INC. OF NEVADA,)
)
Debtor.)
)
In re:) Case No. BK-S-13-17589-LED
) Chapter 11
)
GLOBAL TRACK GPS, LLC,)
) Date of Hearing: November 23, 2013
) Time of Hearing: 3:00 p.m.
Debtor.)
)
)
) Judge: Hon Laurel E. Davis

JOINDER TO OPPOSITION TO MOTION FOR ENTRY OF AN ORDER PURSUANT TO SECTIONS 105(A), 363, 365, 503 AND 507 OF THE BANKRUPTCY CODE AND RULES 2002, 6004, 6006, 9007, 9008 AND 9014 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE APPROVING AND AUTHORIZING (A) BIDDING PROCEDURES IN CONNECTION WITH THE SALE OF SUBSTANTIALLY ALL OF THE OPERATING ASSETS OF DEBTORS; (B) FORM AND MANNER OF NOTICE OF THE SALE HEARING; AND (C) RELATED RELIEF AND JOINDER AND LIMITED OPPOSITION OF CLASS B MEMBERS OF HARBOR STRUCTURED FINANCE, LLC TO OPPOSITION TO DEBTORS' BIDDING PROCEDURE MOTION [DKT.320]

Cope Family Venture ("Cope") by and through its counsel, Jeffrey G. Sloane, Esq., hereby files this within joinder (the "Joinder") to the Official Committee of the Unsecured Creditors' Opposition to Motion for Entry of an Order Pursuant to Sections 105(a), 363, 365, 503 and 507 of the Bankruptcy Code and Rules 2002, 6004, 6006, 9007, 9008 and 9014 of the Federal Rules of

1 Bankruptcy Procedure Approving and Authorizing (A) Bidding Procedures in Connection With the
2 Sale of Substantially All of the Operating Assets of Debtors; (B) Form and Manner of Notice of the
3 Sale Hearing; and (C) Related Relief ("Official Committee of Unsecured Creditors Opposition") [Dkt.
4 No. 356] and the Joinder and Limited Opposition of Class B Members of Harbor Structured
5 Finance, LLC to Opposition to Debtors' Bidding Procedure Motion [Dkt. 320] ("Class B Members'
6 Opposition") [Dkt. No. 357].

7 Cope incorporates by reference all of the arguments set forth in the Official Committee of
8 Unsecured Creditors Opposition and the Harbor Class B Members' Opposition.

9 Cope believes that an extension to the bidding process is essential to maximize the potential
10 for unsecured creditors to receive a benefit from the sale of assets. Furthermore, to deny an
11 extension essentially denies the unsecured creditors due process to the extent that they have been
12 given a very short and unreasonable time to determine whether their best interests are being
13 properly accounted for.

14 Dated this 22nd day of November, 2013.

15
16 BY: /s/ JEFFREY G. SLOANE, ESQ.
17 JEFFREY G. SLOANE, ESQ
18 Nevada Bar No. 000784
19 8935 S. Pecos Road, Suite 21-A
20 Henderson, Nevada 89074
21 Attorneys for Creditor
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Jeffrey G. Sloane, Esq., and that on the 22nd day of November, I caused to be served a true and correct copy of JOINDER TO OPPOSITION TO MOTION FOR ENTRY OF AN ORDER PURSUANT TO SECTIONS 105(A), 363, 365, 503 AND 507 OF THE BANKRUPTCY CODE AND RULES 2002, 6004, 6006, 9007, 9008 AND 9014 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE APPROVING AND AUTHORIZING (A) BIDDING PROCEDURES IN CONNECTION WITH THE SALE OF SUBSTANTIALLY ALL OF THE OPERATING ASSETS OF DEBTORS; (B) FORM AND MANNER OF NOTICE OF THE SALE HEARING; AND (C) RELATED RELIEF AND JOINDER AND LIMITED OPPOSITION OF CLASS B MEMBERS OF HARBOR STRUCTURED FINANCE, LLC TO OPPOSITION TO DEBTORS' BIDDING PROCEDURE MOTION [DKT.320] in the following manner:

X (ELECTRONIC SERVICE) Under Administrative Order 02-1 (Rev. 8-31-04) of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

___ (UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first class postage prepaid, at Las Vegas, Nevada, to the parties listed on the attached service list, at their last known mailing addresses, on the date above written.

___ (OVERNIGHT COURIER) By depositing a true and correct copy of the above-referenced document for overnight delivery via Federal Express, at a collection facility maintained for such purpose, addressed to the parties on the attached service list, at their last known delivery address, on the date above written.

___ (FACSIMILE) That I served a true and correct copy of the above-referenced document via facsimile, to the facsimile numbers indicated, to those persons listed on the attached service list, on the date above written.

/s/ Barbara Meyer
An Employee of Jeffrey G. Sloan, Esq.